

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*,

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**NOTICE OF APPEARANCE, REQUEST FOR SERVICE
OF PAPERS, AND REQUEST FOR MATRIX ENTRY**

PLEASE TAKE NOTICE that Michael S. Etkin, Esq., John Sherwood, Esq. and Cassandra Porter, Esq., and the law firm of Lowenstein Sandler LLP hereby enter their appearance as bankruptcy counsel and Joseph H. Meltzer, Esq., Edward W. Ciolko, Esq., Peter Muhic, Esq., and the law firm of Kessler Topaz Meltzer & Check, LLP hereby enter their appearance as counsel to Peggy Sue Jones, the proposed lead plaintiff ("Lead Plaintiff") and the Putative Class as defined in the Litigation (defined below) (collectively, Lead Plaintiff and the Putative Class are the "Plaintiffs") in the putative class action against General Motors LLC ("GM" or "Defendant") entitled *Peggy Sue Jones, Individually and on Behalf of All Others Similarly Situated v. General Motors LLC*, Case No. 4:14-cv-11197-MAG-DRG (the "Litigation"), pending in the United States District Court for the Eastern District of Michigan (the "District Court"), and request that copies of all pleadings and other papers (however designated) filed in this case, as well as notices given or required to be given in this case, be given and served upon the undersigned at the addresses listed below.

In addition, it is respectfully requested that, pursuant to Rule 2002(g) of the Federal Rules of Bankruptcy Procedure, the following be added to the Court's Mailing Matrix:

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PLEASE TAKE FURTHER NOTICE that pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, the foregoing request includes, without limitation, all orders and notices, including but not limited to applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of affairs, operating reports and plans, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, telecopier or otherwise.

PLEASE TAKE FURTHER NOTICE that if any limited service lists are used in these proceedings, the undersigned request inclusion thereon.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall not constitute a submission by Plaintiffs to the jurisdiction of the Bankruptcy Court. This Notice of Appearance and any subsequent appearance, pleading, claim or suit is not intended nor shall be deemed to waive any of Plaintiffs' substantive or procedural rights, including: (i) the right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) the right to trial by jury in any proceedings so triable herein or in any case, controversy or

proceeding related hereto; (iii) the right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Plaintiffs are or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. Nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Federal or Local Rules of Bankruptcy or Civil Procedure.

Dated: April 24, 2014

LOWENSTEIN SANDLER LLP

By: /s/ Michael S. Etkin
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